

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

**IN RE: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION**

MDL No. 2:18-mn-2873-RMG

This Document relates to:

City of Camden, et al., v. 3M Company,
No. 2:23-cv-03147-RMG

PLAINTIFFS' AND 3M'S SECOND JOINT MOTION FOR EXTENSION OF TIME

Plaintiffs, City of Camden, City of Brockton, City of Sioux Falls, California Water Service Company, City of Del Ray Beach, Coraopolis Water & Sewer Authority, Township of Verona, Dutchess County Water & Wastewater Authority and Dalton Farms Water System, City of South Shore, City of Freeport, Martinsburg Municipal Authority, Seaman Cottages, Village of Bridgeport, City of Benwood, Niagara County, City of Pineville, and City of Iuka (collectively, "Plaintiffs") and Defendant 3M Company ("3M"), pursuant to Local Civil Rule 6.01 respectfully submit this Joint Motion for Extension of Time.

In support of their motion, Plaintiffs and 3M state as follows:

1. On July 26, 2023, twenty-three governmental entities identifying themselves as "Sovereigns" filed a Motion to Intervene in this case for purposes of objecting to Plaintiffs' Motion for Preliminary Approval (Dkt. #35).

2. On the same day, (i) the Sovereigns filed an Omnibus Opposition to Plaintiffs' Motion for Preliminary Approval (Dkt. #37), (ii) a "Subset of Sovereigns" filed a Supplemental Opposition to the Motion for Preliminary Approval (Dkt. #38), (iii) the States of Maine and Vermont (both signatories of the Omnibus Opposition) filed a Supplemental Memorandum of Law in Opposition to the Motion for Preliminary Approval (Dkt. #39), and (iv) the California State Water Resources Control Board and California Department of Corrections and

Rehabilitation filed a “Joinder” in the Sovereigns’ Omnibus Opposition and the Subset of Sovereigns’ Supplemental Opposition to the Motion for Preliminary Approval (Dkt. #40) (collectively, the “Opposition Filings”).

3. The current deadline for Plaintiffs and 3M to respond to the Sovereigns’ Motion to Intervene and to reply to the Opposition Filings is August 9, 2023. Dkt. #48. Plaintiffs and 3M have received one prior extension of these deadlines.

4. Plaintiffs and 3M have engaged in multiple discussions and exchanged several proposals with counsel for the Sovereigns as they continue to attempt to address the concerns the Sovereigns have raised in the Opposition Filings. Despite these substantial good faith efforts, the parties have not resolved all of the issues raised by the Sovereigns.

5. A further brief extension of Plaintiffs’ and 3M’s deadlines would assist the parties’ attempts to narrow or better define the scope of issues, and any disputes, before the Court.

6. Plaintiffs and 3M request an extension up to and including August 16, 2023, to respond to the Sovereigns’ Motion to Intervene and to file their replies to the Opposition Filings.

7. The requested extension would not affect any other deadlines in this case, as no other deadlines have yet been set by the Court.

8. Pursuant to Local Civil Rule 7.02, counsel for Plaintiffs and 3M have conferred with counsel for the Sovereigns. The Sovereigns expressed their desire to continue efforts to resolve differences but declined to consent to the filing of this Motion and the relief requested herein except on the conditions that Plaintiffs and 3M consent to the Sovereigns being allowed until August 30 to review any amendment to the Settlement Agreement and file briefs with respect thereto. Those conditions were not accepted by Plaintiffs or 3M.

9. Pursuant to Local Civil Rule 7.04, no accompanying memorandum has been submitted herewith because this Motion fully sets forth the grounds for relief, and a separate memorandum would serve no useful purpose.

For these reasons, Plaintiffs and 3M respectfully request that their deadlines to respond to the Motion to Intervene and reply to the Opposition Filings be extended to August 16, 2023.

Dated: August 8, 2023

Respectfully submitted,

/s/ Daniel L. Ring

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Proposed Class Counsel
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 8, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served this day on all counsel of record in this case via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ Daniel L. Ring
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